

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC.,¹

Reorganized Debtor.

Chapter 11

Case No. 24-12480 (LSS)

(Jointly Administered)

Hearing Date: September 30, 2025 at 3:30 p.m. (ET)

Objection Deadline: September 19, 2025 at 4:00 p.m. (ET)

**NOTICE OF LITIGATION TRUSTEE'S MOTION
TO MODIFY PROTECTIVE ORDER**

PLEASE TAKE NOTICE that Lawrence R. Hirsh, Litigation Trustee of the Litigation Trust, has filed the *Litigation Trustee's Motion to Modify Protective Order* (the "**Motion**"), a copy of which is attached.²

PLEASE TAKE FURTHER NOTICE that any objections or other responses to the Motion must be in writing, conform with all applicable rules, and be filed with the United States Bankruptcy Court for the District of Delaware (the "**Court**") on or before **September 19, 2025 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion will be held on **September 30, 2025 at 3:30 p.m. (ET)** before the Honorable Laurie Selber Silverstein, United

¹ The last four digits of Franchise Group, Inc.'s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. In addition to the foregoing Reorganized Debtor, the "Reorganized Debtors" include certain affiliated entities, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FRG/>. All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

² Capitalized terms used and not defined in this Notice have the meaning ascribed in the Motion.

States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: September 5, 2025
Wilmington, Delaware

RAINES FELDMAN LITTRELL LLP

/s/ Thomas J. Francella, Jr.

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